Whereas, the presently scheduled discovery cut-off ordered by the Court is January 31, 2014;

Whereas, Local Rule 37-3 for the Northern District of California requires the filing of any motions to compel within seven (7) days after the discovery cut-off;

Whereas, on December 30, 2014, Plaintiffs served Defendant Cathay Pacific Airways, Ltd. ("Cathay Pacific"), with Requests for Admission;

Whereas, on January 22, 2014, Defendant Cathay Pacific requested a two week extension to respond to Plaintiffs' Requests for Admission until February 12, 2014;

Whereas, Plaintiffs agreed to provide the two week extension contingent upon Cathay Pacific's agreement that Plaintiffs' could bring any motion to compel the Requests because of an inadequate response or otherwise after February 7, 2014 – the time period contemplated by Local Rule 37-3.

Now therefore, counsel for Plaintiffs and counsel for Defendant Cathay Pacific hereby stipulate as follows:

Cathay Pacific shall have until February 12, 2014 to respond to Plaintiffs' Requests for Admissions;

Plaintiffs shall have until February 19, 2014 to bring a motion to compel or other discovery dispute to the Court's attention concerning Cathay Pacific's responses to Plaintiffs' Requests for Admissions.

Dated: January 25, 2014 Respectfully submitted,

By: /s/ Steven N. Williams
COTCHETT, PITRE & McCARTHY, LLP
Joeseph W. Cotchett
Steven N. Williams
Adam J. Zapala

Interim Co-Lead Counsel for Plaintiffs

1	/s/ Christopher L. Lebsock
2	Bv:
3	HAUSFELD, LLP Michael D. Hausfeld Michael P. Lehmann
4	Christopher L. Lebsock
5	Interim Co-Lead Counsel for Plaintiffs
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7	
8	By: /s/ Deana Cairo DLA PIPER
9	Deana Cairo Counsel for Cathay Pacific Airways, Ltd.
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11	GENERAL ORDER 45 ATTESTATION
12	I, Steven N. Williams, hereby attest, pursuant to Northern District of California, Local
13 14	Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each
15	signatory hereto.
16	/s/ Steven N. Williams
17	Steven N. Williams
18	
19	SO ORDERED.
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21	Dated: February 5, 2014
22	DONNA M. RYU Charles R. Breyer MAGISTRATE
23	UNITED STATES DISTRICT JÜDĞE
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27	
28	STIPULATION AND PROPOSED ORDER RE TIME TO BRING MOTIONS TO COMPEL